

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

Cassie Cordell Trueblood, next friend of
Ara Badayos, an incapacitated person;
The Snohomish County Public Defender
Association, a non-profit corporation;

No.

v.
Plaintiffs,

**DECLARATION OF PLAINTIFF
CASSIE CORDELL TRUEBLOOD**

The Washington State Department of
Social and Human Services; Western
State Hospital; Kevin W. Quigley,
Secretary of the Department of Social
and Human Services, in his personal
and official capacity; Ron Alder, Chief
Executive Officer of Western State
Hospital, in his personal and official
capacity; Dr. Brian Waiblinger, Medical
Director of Western State Hospital, in his
personal and official capacity;

Defendants.

DECLARATION

I, CASSIE CORDELL TRUEBLOOD, under penalty of perjury, declare as follows:

1. I am over 18 years of age.
2. I am licensed to practice law in Washington State. I practice criminal defense law, representing indigent clients as a public defender.
3. I am employed by Plaintiff Snohomish County Public Defender Association (SCPDA).
4. SCPDA represents the vast majority of indigent criminal defendants prosecuted in Snohomish County, Washington.
5. I am the duly appointed attorney for Ara Badayos on a charge of Assault in the Third Degree. Ms. Badayos is alleged to have slapped a police officer, causing no serious or lasting physical injury.
6. I know Ms. Badayos to be severely mentally ill. She is unable to hold a rational conversation for more than a few seconds. She is declining to take any medications, to wash herself, or to otherwise protect her most basic survival needs.
7. Since July 2, Ms. Badayos has been held in a solitary confinement cell in Snohomish County Jail pending transportation to WSH for competency restoration treatment.
8. Attached to this Declaration as Exhibit 1 is a true and accurate copy of Defendants' official report on Ms. Badayos' mental condition, finding that she is legally incompetent.
9. Attached to this Declaration as Exhibit 2 is a true and accurate copy of the trial court's July 2 order requiring Defendants to transport Ms. Badayos for competency restoration treatment.

DECLARATION OF PLAINTIFF TRUEBLOOD
PAGE 2

10. Attached to this Declaration as Exhibit 3 is a true and accurate copy of Defendant Waiblinger's sworn declaration regarding the timeline for transporting Ms. Badayos, dated July 30.

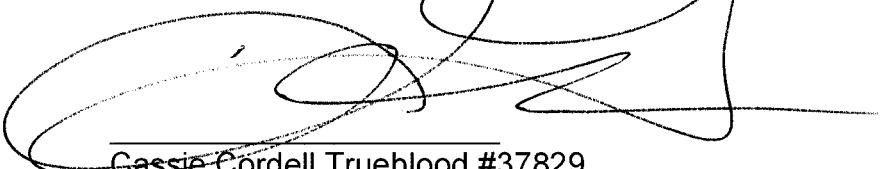
11. Attached to this Declaration as Exhibit 4 is a true and accurate copy of the U.S. Justice Department's official report on the conditions at the Snohomish County Jail.

12. Attached to this Declaration as Exhibit 5 is a true and accurate copy of Defendant Waiblinger's July 25 sworn testimony regarding Defendants' policies for transporting and treating legally incompetent patients.

13. Attached to this Declaration as Exhibit 6 is a true and accurate copy of an email from an official at the Snohomish County Jail regarding the number of patients awaiting transportation to WSH and information regarding how long they waited.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Signed this 4th day of August, 2014 at Everett, Washington.



Cassie Cordell Trueblood #37829
PLAINTIFF